



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Bureau of Air Quality



Air Quality Technical Advisory Committee Meeting

**Harrisburg, PA
June 14, 2012**

Proposed GP-5: Public Comment Period

- March 3, 2012 – Notice of the availability of proposed GP-5 amendments published in the *Pennsylvania Bulletin* with a 60–day public comment period (42 Pa.B. 1187).
- May 2, 2012 – PADEP extended the public comment period to May 23, 2012.
- The Department received comments from 296 commentators including 53 duplicate submissions.

Proposed GP-5: Public Comment Period

Proposed GP-5 Commentators by June 1, 2012	
Commentators	Number
Individuals - comments based on Clean Air Council's form letter	196
Individuals - based on Clean Air Council's website (comments received after deadline)	4
Regulated Industries	9
Regulated Industries (comments received after deadline)	5
Equipment Vendors	4
Equipment Vendors (comments received after deadline)	1
Environmental Groups	5
Consultants	1
EPA	1
General Public	17
TOTAL	243
DUPLICATE submittals based on Clean Air Council's template	53
TOTAL INCLUDING DUPLICATE SUBMITTALS	296

GP-5: Major Issues Raised by Citizens

- The commentators are seeking additional public participation, more stringent emission limitations, more frequent best available technology analyses (BAT) and the removal of discretion for permit exemptions.
- The commentators believe that the proposed GP-5 amendments “will... essentially block all commenting and public participation for compressor stations that are categorized as minor sources.” Public participation should be a top priority.
- Emission limits in GP-5 should be at least as stringent as the limits being imposed on natural gas facilities in certain PADEP regions.

GP-5: Major Issues Raised by Citizens

- Emission limits for formaldehyde, a known carcinogen, should be lowered as much as technologically possible.
- Best Available Technology should be required for each “individual” General Permit rather than periodic analyses during GP-5 revisions.
- The Department should not be granted the authority or discretion to determine whether or not a facility is exempt from the GP-5 requirements.
- Public hearings should be held in each regional office with a question and answer session to address the full impacts of the revised permit.

GP-5: Major Issues Raised by U.S. EPA

- Federally enforceable potential to emit (PTE) limits must be:
 - (1) contained in a permit that is federally enforceable and has undergone public participation; and
 - (2) the limitation must be enforceable as a practical matter.
- GP-5 should include a provision that reserves DEP's right to request an air quality analysis that shows that the facility will not cause or contribute to a violation of a National Ambient Air Quality Standard (NAAQS) or threaten DEP's ability to use the Pennsylvania State Implementation Plan to achieve compliance with a NAAQS.

GP-5: Major Issues Raised by U.S. EPA

- The proposed startup, shutdown and malfunction (SSM) exemption should be deleted.
- The GP-5 Application should address emissions of PM10 or PM2.5, VOCs or require information on greenhouse gas (GHG) emissions from all sources.
- The GP-5 Application should include a provision for fugitive emissions data.
- Applicants should provide the source of information provided for compliance demonstration methods.

GP-5: Major Issues Raised by Industry

- Exempt well heads, vehicle idling, well completions, fugitive dust, and equipment leaks from permitting.
- Incorporate federal requirements only by reference.
- Unmanned facilities that generate significant fugitive dust emissions are uncommon and should not set the standard for the General Permit.
- Increase CO and VOC limit for the lean-burn engines, and NOx and CO limits for rich-burn engines.

GP-5: Major Issues Raised by Industry

- Change the frequency of FLIR infrared camera monitoring from quarterly to annually.
- BAT for all sources should be no more stringent than NSPS and NESHAP.
- Develop a single permit along with the Bureau of Oil and Gas Planning and Program Management that satisfies both programs (Air Quality and Oil and Gas).
- Raised concern regarding the definition of "Natural gas production facility" which may be overly broad.

GP-5: Major Issues Raised by Industry

- The Act 14 notification process should be the only requirement for municipal notifications.
- Remove particulate matter and sulfur dioxide limits.
- Remove compliance demonstrations for formaldehyde and use CO as a suitable surrogate for formaldehyde emission.

GP-5: Major Issues Raised by Industry

- Delete daily monitoring of visible emissions because of unmanned facilities.
- Increase the NOx and CO emission limits for turbines with a rating < 5,000 hp.
- Turbine core replacement should be done in accordance with EPA's NSPS Rule.

GP-5: Major Issues Raised by Vendors

- The monitoring requirements for pressure and temperature relating to catalyst are overly burdensome.
- Any records required by the permit should not be required to be kept on site.
- Non-Methane Non-Ethane Hydrocarbons should be defined and measured in the same manner as the NSPS and exclude formaldehyde.

GP-5: Major Issues Raised by Vendors

- Emission limits for all gas-fueled reciprocating engines should be the same.
- Remove the SO₂, Particulate Matter, and Formaldehyde emission limits for engines.
- The emission limits proposed for RICE engines are lower than is realistically sustainable with current technology.

GP-5: Major Issues Raised by Vendors

- The cut point for larger engines should be set at 500 hp to align with different requirements for stationary ICE in the NSPS and NESHAP.
- The proposed monitoring and testing requirements in GP-5 are not necessary to assure compliance and are both cumbersome and not cost-effective for owners and operators and should be revised.
- An additional reference method should be added to measure Non-Methane Non-Ethane Hydrocarbons.

GP-5: Major Issues Raised by Environmental Groups

- Clarify that GP-5 is not available to permit the compression of gas at landfills and industrial facilities that are not engaged in natural gas production activities.
- General permits should be stand-alone documents and include all applicable regulatory requirements for the source.
- In the event of a violation of emission standards, the Department should require corrective action, not additional testing.

GP-5: Major Issues Raised by Environmental Groups

- A replacement period of 15 years for simple cycle gas turbine cores is too long.
- Replace 85% control of VOC emissions with 98-99% VOC control for certain gas dehydrators.
- Impose limitations on visible emissions from all glycol dehydrators and not only those that use flares.

GP-5: Next steps

- Complete review of the comments and prepare a Comment and Response Document.
- Prepare a draft of the final GP-5 amendments this fall.